UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL –
RETURN RECEIPT REQUESTED

FEB 2 6 2016

Mr. Joe Ganim, Mayor
City of Bridgeport
Margaret E. Morton Government Center
999 Broad Street
Bridgeport, CT 06604

Re: EPA Request for Information, Pursuant to Section 308 of the Clean Water Act EPA Docket No. CWA- 308-R01-FY16-56

Dear Mr. Ganim:

The Environmental Protection Agency ("EPA") is in receipt of the City of Bridgeport's ("City") December 24, 2015 response ("Response") to the July 30, 2015 EPA request for information letter ("2015 Request") regarding Sanitary Sewer Overflows ("SSOs"), sanitary sewer system Capacity Management Operations and Maintenance ("CMOM"), and Municipal Separate Storm Sewer System ("MS4") permit requirements. EPA has reviewed the City's response. This information request letter contains follow-up questions and additional requests for information based on the information provided.

Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C.§ 1318(a), authorizes the EPA to require any owner or operator of a point source to provide information needed to determine whether there has been a violation of the Act. Accordingly, the City of Bridgeport ("City") is hereby required, pursuant to Section 308(a) of the Act, 33 U.S.C. § 1318(a), to respond to this Request for Information (the "Request") in accordance with the schedules provided herein. Please read the instructions in Attachment No. 1 carefully before preparing your response and answer each question in Attachment No. 2 as clearly and completely as possible.

Your response to this Request must also be accompanied by a certificate that is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Attachment No. 3, is attached to this letter. Provide the following information within 30 days of receipt of this letter unless otherwise specified.

Information submitted pursuant to this Request shall be ***sent both in hard copy and electronic copy*** by certified mail and shall be addressed as follows:

United States Environmental Protection Agency
New England Region
5 Post Office Square Suite 100 (OES 04-04)
Boston, MA 02109-3912
Attn: Alex Rosenberg
rosenberg.alex@epa.gov

and an ***electronic copy only*** shall be sent to:

State of Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06109
Attn: Ann Straut-Esden
Ann.Straut-Esden@ct.gov

Compliance with this Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond, within the time frame specified above, also constitutes a violation of the Clean Water Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

The City may assert a business confidentiality claim with respect to part or all of the information submitted to EPA in the manner described at 40 C.F.R. Part 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is submitted to EPA, the information may be made available to the public by EPA without further notice to the City.

This letter is also to inform you that EPA plans to conduct sample reconnaissance work during business hours of March 31, 2016 and possibly the morning of April 1, 2016. EPA will require assistance from City personnel to access and open manhole covers as well as to locate and access MS4 outfalls. EPA will communicate with City staff regarding our expected needs at least two weeks prior to our visit.

If you have questions regarding this Request, please contact Alex Rosenberg of my staff at 617-918-1709 or have your attorney contact Jeffrey Kopf, Senior Enforcement Counsel, at 617-918-1796.

Sincerely,

James Chow, Manager
Technical Enforcement Office
Office of Environmental Stewardship

Attachments

Cc: William Robinson, City of Bridgeport – WPCA
Kim Hudak, CTDEEP
Dennis Grecci, CT DEEP

Attachment No. 1

Information Request

1. Please provide a separate narrative response to each and every question and subpart of a question set forth in this Request. Precede each answer with the text and the number of the question and the subpart to which the answer corresponds.

2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, please explain.

3. Any documents referenced or relied upon by you to answer any of the questions in the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses

4. If information or documents not known or not available to the City as of the date of the submission of its response to this Request should later become known, or available to the City, the City must supplement its response. Moreover, should the City find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the City must notify the EPA and the Connecticut Department of Energy and Environmental Protection ("CTDEEP") of this fact as soon as possible and provide a corrected response.

Attachment No. 2
Respond to the Following

Provide the following information **within 30 days of receipt of this letter** unless otherwise specified: For ease of reference, questions that are direct follow-up to the 2015 Request Letter have had the same identifiers kept. Additional questions have new unique identifiers.

II. Dry Weather Bypasses and Overflows

D. The City's Response (Volume 2) provides a list of bypass reports. In the summary table of bypasses the last three columns are labeled *rain, to basement and to watercourse*. All of the entries in this table have these three columns filled with the letter "*N*". Explain what the significance of the "*N*" is.

Explain why the two bypasses reported on May 2, 2014 are considered by the City to be dry-weather overflows when NOAA precipitation data for Bridgeport, CT indicates that 2.5 inches of rain fell on May 1, 2014 and another 1.49 inches fell on May 2, 2014.

Explain how and by whom the determination is made whether to categorize a bypass as either dry weather or wet weather (i.e. when is the summary table filled-out, what data is used to determine how much rainfall has occurred, etc.). Also explain how and by whom the determination is made whether the back-up either entered a basement or reached a watercourse.

III. Bypass and Overflow Documentation

A. 5. The City's response to Question III.A.5. stated that there were no known discharges from the collection system to surface waters reported since January 2014 during either dry-weather events at points not authorized by the City's NPDES permit to discharge wastewater or during dry weather at Combined Sewer Overflow ("CSO") permitted outfalls. Volume 3 of the response provided documentation from staff who responded to sewer back-up calls during this period. Documentation from a number of events indicate that sewerage was release into a street.

One such event occurred on June 13, 2014 at 85 Staples St. (at Norman St). The report for this event states that the street was flooded and that when they called the westside wastewater pollution control facility ("WPCF") the street level was at 15" and the flow was at 95MGD. National Oceanographic and Atmospheric Administration ("NOAA") records show a total daily precipitation of 1.65 inches on June 13, 2014 and 0.13" in the preceding 24 hours. The photo below shows that there is a stormwater catchbasin directly outside of 85 Staples St.. Explain whether this catchbasin is part of the MS4 system or combined sanitary sewer system. Explain how sewer staff responding to an overflow event are able to make the determination in the field whether the area is a combined or separate sewer system.

Explain how a determination is made either in the field and or at a desk for whether each bypass & overflow reported in Volume 3 of the City's Response ever discharged to a surface water.

How is a determination made regarding whether events are considered wet-weather or dry-weather events. Provide the location and name of the rain station that staff at the wastewater pollution control authority ("WPCA") utilize for their analysis of wet weather events.

VI. Wet Weather Flow Monitoring and Reporting Requirements

A. 3. Pursuant to question VI.A.3. of the 2015 Request, the City is required to submit quarterly bypass and overflow reports. Include in the next quarterly report a copy of the sample location diagrams for both WPCFs (eastside and westside), submitted in the last section of Severn Trent's Emergency Response Plan, with the location of all flow meters labeled. Explain the annotation on the westside WPCF sampling location diagram that states the flowmeter located after dechlorination is "affected by tide". Does this mean that there are periods where the total (secondary treated and secondary bypass) flows leaving the plant is sometimes unknown? If so, explain how often this occurs and what the City does to quantify discharges during these periods.

4. Explain what type of valve is utilized to activate the emergency plant bypass as well as the date this bypass was last used and the reason for its use.

5. Include in all subsequent quarterly bypass and overflow reports the corresponding block test inspection forms for any dates which a bypass or overflow was determined to have occurred.

6. Explain how WPCF staff at both facilities determine when to stop bypassing. If one or multiple flow measurements are utilized to determine the appropriate time to cease a bypass, explain which flow measurements are used to calculate when the plant's influent flow volume has decreased to the level at which the plant is required to treat all flow through secondary treatment. If this calculation cannot be made, or there is a time lag in either when the data necessary to make the calculation can be collected or when the bypass valve can be closed, explain how the WPCF protocols ensure the most efficient transition back to full secondary treatment. As an example, explain why there was a forty-five minute lag between approximately 8:50PM on December 17, 2015, the time that the flow rate dropped below 24MGD, and the time the bypass was stopped.

VII. CMOM Self-Assessment

A. The City's "CMOM Program Self-Assessment" referenced a service agreement between the City and its contract operator Severn Trent Services as containing information concerning protocols for documentation and follow-up prioritization for sewer related complaints and issues. Submit a copy of the service agreement.

B. The City's organization diagram provided to EPA during the November 4, 2014 audit showed two position vacancies under Bill Robinson, one for a CSO Supervisor and one for a Resident Engineer. Please provide an update on the back-filling of these positions. If the City does not intend to fill these positions in the near future, explain which employees are going to be fulfilling the duties once conducted by these two vacant positions.

C. The City's CSO Routine Inspections SOP (Document # BPT-FS017) states in section 6.3 that OceantoSewer or SewertoOcean observations made during daily inspections of CSO outfalls are communicated to the WPCA within 2 hours and that this information is "utilized by the WPCA's engineer's collection system hydraulic model". A revision comment dated October 30, 2014 states that a reference to chalk marks has been removed and that the WPCA flow model is utilized. Explain how the block test observations are "utilized" by the model. Explain the SOP for how and when the City decides to report either a wet-weather or dry-weather discharge from its permitted CSO locations. Bypass reports submitted as part of the City's response seem to indicate that the magnitude of each individual rainfall event is run through the City's hydraulic model to predict whether the depth within the sewer system, with respect to each individual CSO control structure, caused an overflow. If this is the City's methodology for predicting, estimating and reporting wet-weather CSO discharge occurrence and volume, discuss the inherent error in the methodology considering that when the model was constructed in 2010 the variable of sewer depth held the lowest priority during wet-weather model calibration.

D. The daily CSO regulator (block test) inspection form from December 1, 2014 indicates flow discharged from the sewer to the ocean (denoted by a check in the SewertoOcean

column) at seven outfalls. The form notes that the previous CSO regulator inspection had occurred on November 25, 2014 and that the tides on November 26, 2014 were a foot higher than "normal" and that it was the tide coming in and going out that "probably" caused the positive block test results.

1. Explain why the daily CSO regulator inspections had not occurred for the previous five days;
2. Explain if the City reviewed precipitation data from the period when inspections had not been conducted and if so, how the City was able to justify the conclusion that the tide caused the block test results rather than the 1.11 inch rain event that occurred on November 26th, 2014 according to City precipitation records submitted in Volume 1 Tab 2 of the 2015 Response;
3. EPA has acquired precipitation data from the NOAA meteorological stations at the Bridgeport Sikorsky Memorial Airport (Station Identifier - GHCND: USW00094702, "Airport Station") as well as within Bridgeport on Success Hill (Station Identifier - GHCND: USC00060808, "Success Station"). The records from Airport Station on November 24th and 26th, 2014 obtained by EPA are similar to the data reported by the City, 0.54 inches of precipitation on November 24, 2014 and 1.11 inches of precipitation on November 26, 2014. Success Station data however shows a significantly larger precipitation event of 2.31 inches on November 24, 2014. Describe how the differences in local precipitation amounts is currently factored into estimating the frequency, duration, and volume of SSO and CSO events. Explain where the City acquires its rain data, and if other sources of precipitation data are consulted to ensure accurate representation of precipitation variability across the City; and
4. Submit the daily CSO regulator inspection forms for the following dates:
    a. From November 20, 2014 through November 25, 2014; and
    b. From April 1, 2015 through April 26, 2015 (the City has already provided records from the individual dates of April 8, 10 and 17, 2015).

VIII. MS4

A. Question VIII.A. of the 2015 Request required the City to provide an organization diagram that shows all City Departments ***and individuals*** that are involved with MS4 Permit compliance as well as a description of the responsibilities of each department and individual with respect to MS4 Permit compliance. The Response (Tab 6 of Volume 1) includes department and their associated permit responsibilities. Re-submit a response that includes individuals (including names, position titles, and the MS4 compliance tasks and percent full time equivalent ("FTE") spent on MS4 duties for each individual).

B. Question VIII.B. of the 2015 Request required the City to provide a copy of the City's current Stormwater Management Plan ("SWMP") as required pursuant to Section 5.(b) of the 2004 MS4 Permit. The Response (Tab 7 of Volume 1) included a copy of the City's 2008 Stormwater Management Manual which is a guide for development and permitting of new and existing building projects within the City and does not contain the required elements of a Stormwater Management Plan as required by the MS4 Permit. If the City does not have a current SWMP, provide a copy of all outdated SWMPs and a schedule

for when the City will have a current plan complete. If the City has never drafted a SWMP, provide a schedule including a final completion date by which the City will have a SWMP.

Illicit Discharge Detection and Elimination (IDDE)

C. Question VIII.C. of the 2015 Request required the City to list all instances where the City has utilized an IDDE ordinance in an MS4 enforcement context since 2010. Submit a copy of City's Illicit Discharge ordinance as required by the 2004 Permit Section 6.(a)(3)(A)(i) as well as a copy of any other regulation that is available for City staff to utilize for enforcing MS4 requirements. Explain the cause of the low number (one) of recorded illicit discharge connection eliminated between the end of 2010 and 2014 (as is reported in Volume 1 Tab 8 of the City's response).

D. Question VIII.D. of the 2015 Request asked the City to provide MS4 maps that are required pursuant to the MS4 Permit Sections 6.(a)(3)(B)(i)-(ii) that include the name of the waterbody and watershed into which each outfall flows. The City provided stormwater outfall maps within Volume 1 Tab 9 of their response.

1. Provide a key to identify where each individual map is situated within the City boundaries.
2. Identify the six stormwater monitoring locations from which the City takes samples on an annual basis.
3. Explain the four digit numeric identifier associated with each outfall label on the maps. Explain whether these are unique identifiers for each outfall.
4. Provide the exact address and or Lat/Lon of the City's MS4 Sample Location labeled Connecticut Ave Stft / Bpt #57242.
5. Provide the exact address and or Lat/Lon of the City's MS4 Sample Location labeled Fairview Ave Ext and Chamberlain #57349
6. Include the water classification and name of the waterbody into which each respective outfall discharges and the watershed which the outfall is within. Submit a City-wide map that includes the boundaries of each of the watersheds.

E. Question VIII.E. of the 2015 Request required the City to submit a written IDDE plan that includes a protocol for detection for elimination of illicit discharges. In response, the City submitted within Volume 1 Tab 11 an Illicit Discharge Block Diagram that begins with the City receiving a tip or complaint and a narrative explanation of observations and or complaints about evidence of potential illicit discharges that have been shared with the City. Section 6.(a)(3)(B)(iii) of the MS4 Permit requires the City to implement and enforce a program to detect and eliminate illicit discharges. In response to receiving evidence of potential illicit discharges, provide an estimate of how often the City has followed-up by sending out a contractor to conduct biological sampling. In these situations where the fecal coliform concentrations were above the Connecticut water quality standards or Total Maximum Daily Load ("TMDL") limit for the waterbody in question, describe the outcome of the subsequent investigation to identify and eliminate the illicit discharge source.

Construction Site Stormwater Runoff Control

G. Questions VIII.G. of the 2015 Request required the City to describe the City's procedures for notifying developers and operators of their duty to implement the policies within Bridgeport's Stormwater Management Manual dated May 2008 (submitted within Volume 1 Tab 7 of the City's Response) and to describe the City's implementation of and inspection and enforcement of construction stormwater policies pursuant to Section 6.(a)(4)(A)(i) of the MS4 Permit. EPA was unable to locate answers to the following sub-questions within the City's Stormwater Management Manual. Either excerpt specific language from the manual to highlight each answer or re-submit a response that includes the requested information.

1. Describe the City's ***procedures for notifying developers and operators of their duty to implement and maintain stormwater control measures***;

2. Describe whether the City has implemented ***procedures for site plan reviews, inspections, and enforcement of control measures*** at Construction Sites. Provide a written copy of the site plan review procedures and documentation of all inspections and enforcement of the recently approved site plans provided in the City's Response.

Post-Construction Stormwater Management in New Development and Redevelopment

H. Question VIII.H.2. of the 2015 Request required the City to describe the regulatory mechanism to address post-construction runoff from new and re- development pursuant to Sections 6.(a)(5)(A)(i) - (iv) of the MS4 Permit. EPA was unable to locate within the Stormwater Management Manual a mechanism to address post-construction run-off nor a procedure for ensuring adequate long-term operation and maintenance of stormwater control measures. If these mechanisms and procedures do not exist, provide a schedule for when the City will have these requirements fully drafted, approved and implemented.

Pollution Prevention and Good Housekeeping in Municipal Operations

I. Question VIII.I. of the 2015 Request required the City to submit documentation of a municipal operations stormwater pollution prevention program and municipal staff training pursuant to Section 6.(a)(6)(A) of the MS4 Permit. The City responded by providing the linear feet of sewer (not distinguished between municipal separate stormwater sewers ("MS4"), combined (sanitary and stormwater) sewer system ("CSS") and separate sanitary sewers ("SSS")) cleaning and inspection as well as the number of catchbasins cleaned with reference to the City's contract agreement with Severn Trent Services for the operations and maintenance of the City's two Wastewater Pollution Control Facilities and associated CSSs. The City must distinguish stormwater pollution control activities associated with the CSSs and SSSs from MS4 conveyances. Re-submit a response to each part of Questions VIII.I. and include specific MS4 programs, pollution control measures and municipal staff trainings that have the ultimate goal of preventing or reducing pollutant runoff from municipal operations. If these programs and trainings do not yet exist, provide a schedule by which the City will have them developed, approved and fully implemented. The program must include specific record keeping protocols to assure that catch basins within the MS4 are cleaned at least once a year, including a

provision to identify and prioritize those structures that may require cleaning more than once a year.

J. Question VIII.F.2 as well as VIII.J. required the City to list all of the waterbodies into which stormwater directly or indirectly discharges that have an approved Total Maximum Daily Load ("TMDL") and pursuant to Sections 6.(a)(3)(B)(iii) and 6.(k) of the MS4 Permit review its IDDE and Stormwater Management Plans to ensure that they specifically address the pollutant loads and limits cited in the TMDLs. In the City's 2015 Response the State published Factsheet titled "City of Bridgeport Water Quality and Stormwater Summary" (found at http://www.ct.gov/deep/lib/deep/water/ic/Bridgeport_MS4_Fact_Sheet.pdf) was mis-interpreted. The factsheet clearly lists the 7 approved TMDLs applicable to Bridgeport's MS4 discharges. Provide a schedule that explains the process of reviewing plans and programs for TMDL requirements and specify the date(s) by which the City plans to address TMDL requirements within its Stormwater Management Plan and IDDE program.

IX. MS4 Outfall Sampling

A. The City shall inspect and sample its MS4 outfalls, MS4 discharges to other municipalities' MS4s or non-City owned outfalls, and CSO outfalls in accordance with the requirements below. The City shall utilize the following IDDE screening thresholds as guidelines for its analysis of the data generated for each field sample to include. Further investigation and follow-up must be conducted and documented if sample results are above any individual screening thresholds:

Bacteria: Unique bacteria limits have been established by the State with respect to the water quality classification of the receiving waterbody segment into which each individual MS4 outfall discharges. Therefore the City must identify the TMDL established bacteria limit that is applicable to each MS4 outfall discharge point and group all reporting by this criteria in the future. If a TMDL only establishes limits for fecal coliform bacteria and not for E.Coli or entero then analysis should be conducted for fecal coliform and compared to the appropriate limits. As examples:

Outfall(s) that discharge into Cedar Creek (segment 2 of Estuary 7 - Black Rock Harbor) must have their bacteria results compared to the TMDL wasteload allocation criteria for a single sample of 500 coliform forming units ("cfu")/100 milliliters ("cfu/100 ml") of Enterococcus bacteria.[1]

Outfall(s) that discharge into the Pequonnock River must have their bacteria results compared to the TMDL wasteload allocation criteria for a single sample of 235 cfu/100 ml of E.Coli bacteria.[2]

[1] http://www.ct.gov/deep/lib/deep/water/tmdl/statewidebacteria/estuary7bridgeport.pdf
[2] http://www.ct.gov/deep/lib/deep/water/tmdl/statewidebacteria/pequonnockriver7105.pdf

Surfactants: equal to or greater than 0.25 milligrams per liter ("mg/l") (via field kits) or 0.1 mg/l via laboratory analysis

Ammonia: equal to or greater than 0.5 mg/l

Chlorine: greater than non-detect (0.02 mg/l method detection limit)

B. Dry-weather investigations: By May 31, 2016, under dry-weather conditions (less than 0.1 inches of rain in the preceding 48 hours and no significant snowmelt), the City shall inspect all MS4 outfalls, MS4 discharges to other municipalities' MS4s, or non-City outfalls, and CSO outfalls, and sample those with any amount of flow. At a minimum, outfalls shall be sampled, and samples shall be analyzed and screened for E. coli or enterococcus bacteria, surfactants, ammonia, and total residual chlorine.

C. Wet-weather investigations: By August 31, 2016, at least once during wet weather conditions, the City shall sample all MS4 outfalls, MS4 discharges to other municipalities' MS4s or non-City outfalls, and CSO outfalls where flow was not observed during dry weather inspections or sampling, as well as those outfalls or interconnections that did not equal or exceed IDDE screening thresholds during dry-weather sampling. For the purposes of sampling outfalls or interconnections, "wet-weather conditions" should consist of at least 0.25-inches of rain over the 24 hour period prior to sampling. To facilitate sample planning and execution, however, precipitation events sufficient to produce flow in an outfall will also be acceptable. Sampling at CSO outfalls shall be performed during a precipitation event prior to activation of the upstream CSO regulator(s), or during a precipitation event that does not cause any upstream CSO regulator(s) to activate. The City shall maintain detailed and accurate records of the date and time that sampling was conducted and the weather conditions both during, and in the 24 and 48 hours prior to, each sampling event. Samples shall be analyzed screened for the parameters outlined in Question IX.B. above.

X. Collection System Continuous Flow Monitoring

A. Based on a comparison of 2014 and 2015 CSO wet-weather bypass reports, block test inspection forms, CSO model calibration predictions and frequency of SSO basement back-ups and bypasses, it does not appear that the level of precision and accuracy of the City's sanitary sewer collection system characterization is sufficient to ensure compliance with the City's NPDES permit requirements to report all bypasses or to develop, implement and verify the effectiveness of mitigation work to reduce and eliminate sanitary sewer overflows. Therefore, **by April 15, 2016** submit a Monitoring Plan to EPA and CT DEEP to install continuous monitoring devices to quantify and record authorized and unauthorized bypasses from the sewage collection system. The Monitoring Plan[3] must include at a minimum, the following elements.

[3] EPA guidance on the development of monitoring plans is available within the CSO Guidance for Monitoring and Modeling (EPA publication #832-B-99-002).

1. An identification of monitoring and modeling goals and objectives including but not limited to:

    a. Increase accuracy and completeness of SSO and CSO discharge reports;

    b. Gain the ability to more accurately assess hydraulic response of sanitary sewer conveyance system to varying rainstorm events throughout a majority of sewer subsections; and

    c. Validate or determine the need to update/revise the City's existing collection system hydraulic model by collecting a minimum of one full-year of continuous flow monitoring data.

2. Installation of continuous monitoring devices at CSO outfalls and other in-system locations that together represent the system as a whole based on elements such as drainage area flow contributions, land use and sensitive receiving waters. Monitoring locations within the plan must include the CSO weir or gate structures listed below. Monitoring devices must be installed in a manner that will be able to measure the date and time of bypass occurances and the volume of a bypass, while factoring out tidal influence as applicable:

    a. ANTH;
    b. ARBOR;
    c. GRAND;
    d. HUNT;
    e. TRAT;
    f. CHUR;
    g. WANN; and
    h. BAYEL.

3. A protocol for precipitation data gathering and analysis to ensure data used to model or calculate flows is representative;

4. A duration of continuous monitoring for a minimum of one year from the date of device installation and calibration, after which point the value of additional monitoring data must be evaluated based on the additional data's effect to change the estimated mean and variance of the existing dataset;

5. Procedures for the City's analysis of the monitoring data on an annual basis to match data, information needs and available resources for future sewage pollution control projects; and

6. An implementation schedule that ensures monitors be installed and calibrated no later than 90 days from the date that the plan is approved.

B. Submit a report to EPA and CTDEEP by no later than March 1, 2017, and again on or no later than March 1, 2018, that includes the following information for the previous calendar year:

1. Activation history and discharge volume for each CSO location organized chronologically by outfall. Justification for any discharge monitoring results which upon analysis are considered false positives (in these cases references must be made to precedent precipitation, tide levels and other applicable factors);

2. Daily precipitation records including total rainfall and peak intensity;

3. A single map that includes all active CSO locations, and locations of any SSOs from the previous calendar year; and

4. A table containing all CSO and other flow monitoring device locations, their receiving water, control structure elevation, type of tide gate (if applicable), the date when monitoring began and the date monitoring ended, if applicable.

End of Questions

Attachment No. 3

Statement of Certification

I declare under penalty of perjury that I am authorized to respond on behalf of the City of Bridgeport. I certify that the foregoing responses and information submitted were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)